

Re: NWOD In-Canal Stabilization Test Section Work Plan for Agency Review - Today if possible

Kathryn Hernandez to: pfuglevand

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From: Kathryn Hernandez/R8/USEPA/US
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NWOD Working Group,

EPA and the State DERR have reviewed your request. We are giving conditional approval for the pilot test section. Our primary concern at this point is any in-stream impacts from the use of this material. If at any time during the pilot of the In-Canal Stabilization Test Section, the regulating agencies identify any significant concerns with the potential impacts to the canal or surrounding area, the pilot will be ceased. The content of the Portland Cement needs to be provided to the agencies in advance of its use. The Portland Cement should be documents as containing no slag or fly ash (which can contain metals). A TCLP is needed on the stabilized material created during the pilot.

We are confused why the original SPA would be removed if the Portland Cement is used, since an alternative may be needed on windy days, so more discussion would be needed on that issue. At this point the workplan should therefore present the pilot details, and the SPA should be discussed as part of the overall design for Segments 2B and 3, if the pilot is successful.

Once these issues have been addressed, please revise the workplan and then agencies will evaluate whether to allow this work to proceed as a pilot only.

Kathy

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